

DEC - 9 2003

**Comments by the Adoption Professionals Association of Massachusetts on  
Proposed Rules for Implementation of the Intercountry Adoption Act posted  
in the Federal Register on September 15, 2003**

The Adoption Professional Association Of Massachusetts applauds the work of the State Department in preparing these proposed rules. In general, we believe that the rules are representative of best practices within the field of intercountry adoption and present fair and balanced opportunities for agencies of all sizes to meet accreditation requirements. We support the intent of the IAA and these proposed rules to elevate the standards of practice for all intercountry adoptions affected by the Intercountry Adoption Treaty to a best practice level.

APAM has the following specific comments and suggestions regarding the text of the proposed rules:

**Post-placement services**

APAM members believe that post-placement services, whether before or subsequent to legalization, should be provided by qualified personnel. Therefore, we suggest the following revision of Definitions 96.2 *Adoption Service*:

(5) Monitoring a case after a child has been placed with prospective adoptive parents(s) until final adoption; Providing required periodic reports to the child's country of origin, or any other post-adoption services required by the child's country of origin; or

AND

(6) When necessary because of a disruption before final adoption, assuming custody and providing (including facilitating the provision of) child care or any other social service pending an alternative placement; When necessary because of dissolution, assuming custody and providing (including facilitating the provision of) alternative permanent placement.

**Adoptive Parent Training**

96.48 (g) APAM members are concerned that the proposed language could imply to adoptive parents that they are entitled to an exemption from required training. Therefore we propose the following alternative language:

96.48 (g) The agency or person exempts prospective adoptive parent(s) from all or part of the training and preparation that would normally be required for a specific adoption only when, in the agency or person's opinion, the parent(s) have received adequate prior training or experience as parent(s) of children adopted from abroad.

**Birth Family History**

96.49 APAM members are concerned that the proposed rule does not place sufficient emphasis upon the importance of obtaining birth family history whenever possible. Therefore, we propose the following additional and alternative language:

96.49 (d) (3) Birth family biopsychosocial history;

(4) Growth data, including pre-natal history, and developmental status at the time of the child's referral for adoption; and

(5) Specific information on the known health risks in the specific region or country where the child resides.

AND

96.49 (f) (1) Information about the child's birth family history, cultural, racial religious, ethnic, and linguistic background; and

AND

96.49 (f) (3) Information about any known siblings including their whereabouts, if known.